



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Ronald Sklansky
Clearinghouse Director

Richard Sweet
Clearinghouse Assistant Director

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 06-054

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated January 2005.]

4. Adequacy of References to Related Statutes, Rules and Forms

The first sentence of the explanation of agency authority in the rule analysis states that under s. 457.03, Stats., the Professional Counselor Section is charged with establishing examination requirements for becoming a licensed professional counselor. However, the only mention of examinations in s. 457.03 pertains to social workers, not professional counselors. It appears that the correct citation is s. 457.12 (4), Stats., which pertains to professional counselors passing an examination approved by the Professional Counselor Section.

Also, for the same reason, the reference to s. 457.03 (3) under “Statutory authority” should be deleted.

5. Clarity, Grammar, Punctuation and Use of Plain Language

The plain language analysis states that the proposed rule permits the section “to approve another examination that it deems to be equivalent to the other three.” However, the text of the rule merely allows the section to approve another examination. If equivalency is required, it should be included in the text of the rule.